

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:
KRISJENN RANCH, LLC
Debtor

§ § § §

Chapter 11

Case No. 20-50805

**KRISJENN RANCH, LLC and
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE
ROW as successors in interest to
BLACKDUCK PROPERTIES, LLC,
*Plaintiffs***

[illegible]

V.

**DMA PROPERTIES, INC., and
LONGBRANCH ENERGY, LP,
*Defendants***

Adversary No. 20-05027

DMA PROPERTIES, INC
Cross-Plaintiff/Third Party Plaintiff

§§§§§

V.

**KRISJENN RANCH, LLC,
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE ROW,
BLACK DUCK PROPERTIES, LLC,
LARRY WRIGHT, and JOHN TERRILL**
*Cross-Defendants/Third-Party
Defendants*

Adversary No. 20-05027

**KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH, AND
KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS SUCCESSORS IN INTEREST
TO BLACK DUCK PROPERTIES, LLC, AND LARRY WRIGHT'S
EXHIBIT AND WITNESS LIST**

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively

the “Debtors”), and Larry Wright, individually, and submit their list of exhibits to be offered and submit their list of witnesses who may or will be called to testify at the January 11, 2021, trial in the above styled matter:

EXHIBIT NO.	DESCRIPTION OF EXHIBIT	OFFERED	ACCEPTED	REJECTED
1	Email August 5, 2016 with attached Memo July 14, 2010			
2	Email FW on January 10, 2019 referring to Email July 20, 2014			
3	Email December 2, 2015 Subject: Business Formation			
4	Email FW on January 10, 2019 referring to Email February 5, 2016			
5	Black Duck Company Agreement			
6	Email February 19, 2016			
7	Email May 13, 2016 through June 3, 2016			
8	Email March 31, 2016			
9	Email April 17, 2016			
10	Email May 13, 2016			
11	Email June 8, 2016			

12	Email June 8, 2016 through June 9, 2016			
13	Agreement for Assignment			
14	Email July 15, 2016			
15	Email September 20, 2016			
16	Email September 28, 2016			
17	Email October 13, 2016			
18	Email November 8, 2016			
19	Receipt of Payment			
20	Email February 21, 2017			
21	Email February 21, 2017			
22	Email March 2, 2017			
23	Promissory Note			
24	Email FW on January 10, 2019 referring to Email April 25, 2017			
25	Email April 8, 2017			

26	Email April 17, 2017			
27	Email April 24, 2017			
28	Email FW on January 10, 2019 referring to Email May 25, 2017			
29	Email May 31, 2017			
30	Email FW on January 10, 2019 referring to Email June 30, 2017			
31	Consent of Members July 13, 2017			
32	Extension of Closing Date July 13, 2017			
33	Email July 17, 2017			
34	Email August 3, 2017			
35	Email October 9, 2017			
36	Deed, Conveyance and Assignment August 11, 2017			
37	Real Estate Lien Note Asilo August 14, 2017			
38	Real Estate Lien Notes August 14, 2017			
39	Email April 9, 2018 with attachment Recorded Longbranch Assignment dated October 2, 2017			

40	Email January 9, 2018			
41	**** Electronically Filed Document**** Deed of Trust for Loan to KrisJenn			
42	Email FW on January 10, 2019 referring to Email January 17, 2018			
43	Email January 31, 2018			
44	Email February 1, 2018			
45	Email FW on January 10, 2019 referring to Email February 2, 2018			
46	Email February 2, 2018			
47	Email February 3, 2018			
48	Email February 3, 2018			
49	Email February 3, 2018			
50	Email February 5, 2018			
51	00193765 VOL: 3610 PG:414 Agreement			
52	Email February 7, 2018			
53	Email February 7, 2018			

54	Email February 8, 2018 through April 9, 2018			
55	Email FW on December 4, 2020 referring to Email February 8-9, 2018			
56	TCRG Company Agreement			
57	Email February 20, 2018			
58	Harris SWD Agreement			
59	Email March 20, 2018			
60	Assignment and Resignation Agreement			
61	Deed, Conveyance, Assignment and Bill of Sale			
62	Email FW on January 10, 2019 referring to Email April 9-11, 2018			
63	Email April 9, 2018 with Attachment			
64	Email April 9, 2018 with Attachment			
65	Email April 9, 2018 with Attachment			
66	Email April 9-11, 2018			
67	Email April 10, 2018			

68	Email April 10 through July 24, 2018			
69	Email April 11, 2018			
70	Email FW on December 7, 2020 referring to Email April 10 through July 24, 2018			
71	Instrument Number: 2018-4273			
72	Guaranty of Debt			
73	Notice of Default			
74	Letter October 12, 2018			
75	Email November 7, 2018			
76	Email December 19, 2018			
77	Letter December 21, 2018			
78	Email FW on December 7, 2020 referring to Email July 24, 2018			
79	Intentionally left blank.			
80	Email FW on December 7, 2020 referring to Emails December 19, 2018 and April 4, 2019			
81	Email January 31, 2019			

82	Email February 1, 2019			
83	Term Note			
84	Loan Agreement			
85	Release of Lien			
86	Email February 19, 2019			
87	Letter February 26, 2019			
88	Letter March 5, 2019			
89	Email FW on December 7, 2020 referring to Email April 3, 2019			
90	Email April 5, 2019			
91	Email April 13, 2019			
92	Email April 16, 2019			
93	Email April 23, 2019			
94	Email May 3, 2019			
95	Email May 21, 2019			

96	Email May 31, 2019			
97	Compromise Settlement Agreement			
98	Johns&Counsel Supplement to Engagement Agreement and Contract for Contingent Fee			
99	Email September 16, 2020			
100	Text messages produced by Longbranch Energy, LP,			

Debtors and Wright reserve the right to request admission of exhibits designated by any other party.

Witnesses who may be called to testify are as follows:

1. Larry Wright
c/o William Germany
BAYNE, SNELL & KRAUSE
1250 N.E. Loop 410, Suite 725
San Antonio, TX 78209
wgermany@bsklaw.com
2. Frank Daniel Moore
c/o Timothy Cleveland
Austin Krist
Cleveland | Terrazas PLLC
303 Camp Craft Road, Suite 325
Austin, Texas 78746
(512) 689-8698
tcleveland@clevelandterrazas.com
akrist@clevelandterrazas.com
3. Darin Borders
c/o Timothy Cleveland
Austin Krist
Cleveland | Terrazas PLLC
303 Camp Craft Road, Suite 325

Austin, Texas 78746
(512) 689-8698
tcleveland@clevelandterrazas.com
akrist@clevelandterrazas.com

4. Hagan Cohle
c/o William Germany
BAYNE, SNELL & KRAUSE
1250 N.E. Loop 410, Suite 725
San Antonio, TX 78209
wgermany@bsklaw.com
5. Craig Crockett
2509 Merrick Street
Fort Worth, Texas 76107
(817) 626-9898
Craig@TCRG.com
6. David Strolle
(210) 348-6600
Dstrolle@caglaw.net
7. John Terrill
12712 Arrowhead Lane
Oklahoma City, OK 73120
8. Adam McCleod
c/o William D. Kuhlmann, Jr.
ALBERT, NEELY & KUHLMANN, L.L.P.
1600 Oil and Gas Building
309 West Seventh Street
Fort Worth, Texas 76102

Debtors and Wright reserve the right to call rebuttal witnesses and any witness designated by another party.

Dated: January 4, 2021.

Signatures on following page.

Respectfully submitted,

MULLER SMEBERG, PLLC

By: /s/ John Muller

C. John Muller IV

State Bar No. 24070306

john@muller-smeberg.com

Ezekiel J. Perez

State Bar No. 24096782

zeke@muller-smeberg.com

111 W. Sunset Rd.

San Antonio, TX 78209

Telephone: 210-664-5000

Facsimile: 210-598-7357

ATTORNEYS FOR DEBTORS

BAYNE, SNELL & KRAUSE

1250 N.E. Loop 410, Suite 725

San Antonio, Texas 78209

Telephone: (210) 824-3278

Facsimile: (210) 824-3937

Email: wgermany@bsklaw.com

By: /s/ William P. Germany

WILLIAM P. GERMANY

State Bar No. 24069777

ATTORNEY FOR THIRD-PARTY

DEFENDANT LARRY WRIGHT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 4th day of January 2021:

Michael Black
BURNS & BLACK PLLC
750 Rittiman Road
San Antonio, Texas 78209
210-829-2022
210-829-2021 fax
mblack@burnsandblack.com
Attorneys for Longbranch Energy, LP
and DMA Properties, Inc.

Christopher S. Johns
Christen Mason Hebert
JOHNS & COUNSEL PLLC
14101 Highway 290 West, Suite
400A
Austin, Texas 78737
512-399-3150
512-572-8005 fax
cjohns@johnsandcounsel.com
chebert@johnsandcounsel.com

Timothy Cleveland
CLEVELAND | TERRAZAS PLLC
4611 Bee Cave Road, Suite 306B
Austin, Texas 78746
512-689-8698
tcleveland@clevelandterrazas.com
Attorneys for DMA Properties, Inc.

Natalie Wilson
LANGLEY & BANACK, INC.
745 East Mulberry Avenue | Suite 700
San Antonio, TX 78212
210-736-6600
lwilson@languleybanack.com
Attorneys for DMA Properties, Inc.

Jeffery Duke
DUKE BANISTER MILLER & MILLER
22310 Grand Corner Drive, Suite 110
Katy, Texas 77494
jduke@dbmmlaw.com
Counsel for Longbranch Energy, LP

William Germany
BAYNE, SNELL, & KRAUSE
1250 NE Loop 410, Ste. 725
San Antonio, Texas 78209
T- (210) 824-3278
F- (210) 824-3937
wgermany@bskaw.net
Attorney for Larry Wright

OFFICE OF THE UNITED STATES
TRUSTEE
903 San Jacinto Blvd, Room 230
Austin, Texas 78701
shane.p.tobin@usdoj.gov
United States Trustee

/s/ John Muller

C. John Muller IV

1